

1 November 2021
RET and Energy Section
Clean Energy Regulator
GPO Box 621 Canberra ACT 2601 S

Submitted via email: CER-CERT@cer.gov.au

Corporate Emissions Reduction Transparency report

Pangolin Associates appreciates the opportunity to provide feedback on the proposed practical application guidelines and the design of the CERT report 'company view' and 'datasheet view'.

Pangolin Associates is a national energy and carbon management consultancy. Pangolin helps organisations achieve efficiencies and competitiveness through measuring, reducing and offsetting environmental impacts such as energy use and carbon emissions. We are a leading provider under the government certified carbon neutrality program - Climate Active (previously known as NCOS) and provide NGER audit and verification services. Pangolin Associates was also the first company in this sector to be certified carbon neutral for our its operations as well as the service we provide under the Climate Active scheme.

Pangolin Associates recommends the following points regarding the guidelines:

- 2.1 Participation: Require participants who want to opt out of the program to publicly announce the reason behind their choices.
- 3.3.1 Commitments (progress verified):
 - add "quantifiable" to the list of criteria.
 - Point f: for year-on-year reporting consistency, we suggest that the participant maintain the same scope 2 accounting approach once one is selected.
- 3.4.1 Renewable Electricity Commitments: Add "quantifiable" to the list of criteria.
- 10.1 Reporting: The reduction measures reported need to be within the 12-month window to avoid that previously implemented reduction measures are reported twice.
- 11.2 important information: Share with participants the recently published Net-Zero Standard to assist them in preparing their emissions reduction targets, which would help limiting global temperature rise to 1.5°C by setting near-term and long-term science-based targets. Clean Energy Regulator could provide an emissions reduction framework based on this latest standard.

- 11.1.2: Could the Clean Energy Regulator specify what are “other internal processes” to check the accuracy of claims made by the participants and ensure that targets announced are both reachable and aligned with the level of decarbonization required to keep global temperature increase to well-below 2°C compared to preindustrial temperatures. Would certified auditors be involved in this process? Finally, we recommend that participants are asked to provide financial demonstration of the GHG reduction measured (e.g. capital expenditure or supplier invoices for implementation) and not simply a link to a sustainability report showing their reduction actions.

Pangolin Associates recommends the following points regarding the CERT report company view and datasheet view:

- Supporting Commentary: This section should include the activities undertaken or to be undertaken by the participant to reach the set target. It should describe the interim targets and actions to ensure that the set target is reachable.
- Adding a section for “Lessons learnt”: If the program is successful and year on year reports are published, it is recommended to add a section “Lessons Learnt” for participants to share what worked and did not work in their transition to lower emissions. This would drive collaboration between the participants and ensure mistakes are not repeated in the transition to a net-zero economy.